

RE: JOHN R COUGHLIN

) Case No. 20 B 00243  
)  
Debtor ) Chapter 13  
)  
) Judge: DONALD R CASSLING

**NOTICE OF MOTION**

JOHN R COUGHLIN

5723 W 129TH ST #9  
CRESTWOOD, IL 60418

DAVID M SIEGEL

via Clerk's ECF noticing procedures

Please take notice that on February 27, 2020 at 10:00 am my designee or I will appear before the Honorable Judge DONALD R CASSLING at 219 South Dearborn Courtroom 619, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on February 10, 2020.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY**

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On January 06, 2020 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend plan - #2.3 - for submit language and prorate schedule I; #8.1 - language increase payment or not cannot be if needed; address student loans in #5.2 or #8.1.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

/s/ Tom Vaughn

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
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